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225 N. 5th Street, Suite 900
Grand Junction, CO 81501
(970) 263-5141
Fax (970) 263-5161

March 13, 2012

Mr. Daron R. Haddock, Coal Program Manager
Environmental Manager
Division of Oil, Gas, and Mining
P.O. Box 145801
Salt Lake City, Utah 84114-5801

Subject: Response to Division's Mid-term Review of the Gordon Creek 2, 7 & 8
Mines; Deficiency regarding Updating the Ownership and Control
Information in the M&RP

Dear Mr. Haddock:

Please find enclosed with this letter the appropriately completed C1/C2 forms, two copies of modified Mining and Reclamation Plan (M&RP) text identified with redline text, and six copies of the modified pages of the M&RP. The modification includes the update of the ownership and control information in the Gordon Creek 2, 7 & 8 Mines M&RP. These pages have been updated as requested by the Division after the mid-term review of the M&RP.

Please note that I have added text to the M&RP that indicates the most recent information regarding ownership and control of the mine is included in the annual reports for this mine. The inclusion of this information in the annual report has been the practice of several of the mine operators in the state to reduce the number of modifications to the M&RP. The updated ownership and control information in the annual report is typically the same as that information contained in the OSM AVS.

If you have any questions regarding the information provided in this letter, please give me a call at (970) 261-1425.

Sincerely,

A handwritten signature in blue ink that reads 'Chris D. Hansen'.

Chris D. Hansen
Environmental Coordinator
Arch Western Bituminous Group, LLC

RECEIVED

MAR 14 2012

DIV. OF OIL, GAS & MINING

Dugout Canyon Mine * Skyline Mine * Sufco Mine * West Elk Mine

APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: Mountain Coal Company, LLC

Mine: Gordon Creek 2, 7 & 8 Mines

Permit Number: _____

Title: Mid-term Deficiency Response

Description, Include reason for application and timing required to implement:

Replace ownership and control information in the MRP.

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

- | | |
|---|---|
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ <input type="checkbox"/> increase <input type="checkbox"/> decrease. |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 2. Is the application submitted as a result of a Division Order? DO# _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 4. Does the application include operations in hydrologic basins other than as currently approved? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 6. Does the application require or include public notice publication? |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 7. Does the application require or include ownership, control, right-of-entry, or compliance information? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 9. Is the application submitted as a result of a Violation? NOV # _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 10. Is the application submitted as a result of other laws or regulations or policies?
<i>Explain:</i> _____ |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 11. Does the application affect the surface landowner or change the post mining land use? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2) |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 13. Does the application require or include collection and reporting of any baseline information? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 15. Does the application require or include soil removal, storage or placement? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 16. Does the application require or include vegetation monitoring, removal or revegetation activities? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 17. Does the application require or include construction, modification, or removal of surface facilities? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 18. Does the application require or include water monitoring, sediment or drainage control measures? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 19. Does the application require or include certified designs, maps or calculation? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 20. Does the application require or include subsidence control or monitoring? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 21. Have reclamation costs for bonding been provided? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream? |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 23. Does the application affect permits issued by other agencies or permits issued to other entities? |

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

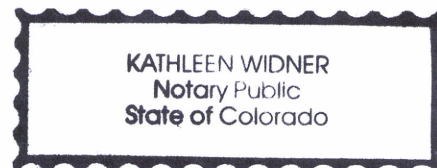
Chris D. Hansen
Print Name

Chris D. Hansen ENV. Coord. 3-13-12
Sign Name, Position, Date

Subscribed and sworn to before me this 13 day of MARCH, 20 12

Kathleen Widner
Notary Public

My commission Expires: 8-3, 20 14
Attest: State of COLO } ss:
County of MESA



For Office Use Only:

Assigned Tracking
Number:

Received by Oil, Gas & Mining

RECEIVED

MAR 14 2012

DIV. OF OIL, GAS & MINING

APPLICATION FOR COAL PERMIT PROCESSING

Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: Mountain Coal Company, LLC

Mine: Gordon Creek 2, 7 & 8 Mines

Permit Number:

Title: Mid-term Deficiency Response

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED

☐ Add ☒ Replace ☐ Remove

Pages 2-4 through 2-6 with new 2-4, 2-5, 2-5A, 2-5B, 2-5C, 2-5D, and 2-6.

☐ Add ☐ Replace ☐ Remove

A A H * 528 * H * A *

Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

Received by Oil, Gas & Mining

(b) Leasehold interest in coal:

Mountain Coal Company

2.2.4 Purchases of Record Under a Real Estate Contract for Surface Area or Coal.

Any purchaser of record under a real estate contract of the area to be affected by surface operations and facilities and any purchaser of record under a real estate contract of the coal to be mined:

None.

2.25 Operator

The operator, if the operator is a person different from the applicant, including his or her telephone number:

The operator is the same as the applicant.

2.2.6 Resident Agent.

The resident agent of the applicant who will accept service of process, including his or her telephone number:

C. T. Corporation System

50 West Broadway

Salt Lake City, Utah 84104

Telephone Number: 1-(801) 531-7090

2.2.7 Business Designation.

A statement of whether the applicant is a corporation; partnership, single proprietorship, association or other business entity:

The applicant is a Delaware corporation.

2.2.7.1 Officers and Directors of the Applicant.

The names and addresses of every officer, partner, director, or other person performing a function similar to a director of the applicant:

Arch Coal, Inc.
Directors /Officers Report As of 2/29/2012

Directors

James R. Boyd	Lead Director First Elected: 4/27/2006
Douglas H. Hunt	Director First Elected: 4/4/1995
A. Michael Perry	Director First Elected: 9/28/1998
Theodore D. Sands	Director First Elected: 2/25/1999
John W. Eaves	Director First Elected: 2/23/2006
David D. Freudenthal	Director First Elected: 2/23/2011
Patricia Fry Godley	Director First Elected: 7/22/2004
Brian J. Jennings	Director First Elected: 7/27/2006

Mining and Reclamation Plan
Gordon Creek No. 2/7/8 Mines

J. Thomas Jones Director
First Elected: 7/21/2010

Robert G. Potter Director
First Elected: 2/22/2001

Wesley M. Taylor Director
First Elected: 7/28/2005

Peter I. Wold Director
First Elected: 7/21/2010

Steven F. Leer Chairman & Chief Executive Officer
First Elected: 4/27/2006

Officers

Steven F. Leer Chairman & Chief Executive Officer
First Elected: 4/27/2006

Jeffrey W. Strobel Vice President - Business Development and Strategy
First Elected: 10/17/2011

John W. Eaves President & Chief Operating Officer
First Elected: 4/27/2006

Paul A. Lang Executive Vice President - Operations
First Elected: 7/28/2011

David N. Warnecke Senior Vice President - Marketing and Trading
First Elected: 2/24/2011

John T. Drexler Senior Vice President & Chief Financial Officer
First Elected: 4/24/2008

Robert G. Jones Senior Vice President - Law, General Counsel and
Secretary
First Elected: 8/1/2008

C. Henry Besten Jr. Senior Vice President - Strategic Development
First Elected: 12/1/2002

John W. Lorson Vice President and Chief Accounting Officer
First Elected: 4/24/2008

Deck Slone Vice President - Government, Investor and Public Affairs
First Elected: 8/1/2008

Anthony S. Bumbico Vice President - Safety
First Elected: 4/27/2006

Mining and Reclamation Plan
Gordon Creek No. 2/7/8 Mines

Sheila B. Feldman	Vice President - Human Resources First Elected: 2/3/2003
David E. Hartley	Vice President & Chief Information Officer First Elected: 8/1/2009
Charles David Steele	Vice President - Tax Planning First Elected: 4/24/2003
James E. Florczak	Treasurer First Elected: 8/17/1998
Casey Warner	Director - Internal Audit First Elected: 4/23/2009
Jon S. Ploetz	Assistant Corporate Secretary First Elected: 2/18/2010

Arch Western Acquisition Corporation
Directors/Officers Report as of 2/19/12

Directors

C. Henry Besten Jr.	Director First Elected: 1/26/2000
Robert G. Jones	Director First Elected: 5/31/2011
Paul A. Lang	Director First Elected: 6/27/2005

Officers

Paul A. Lang	President First Elected: 6/27/2005
Charles David Steele	Vice President - Tax First Elected: 5/23/2003
John T. Drexler	Vice President First Elected: 5/1/2008
James E. Florczak	Vice President First Elected: 3/28/2002
James E. Florczak	Treasurer First Elected: 9/15/1998

Mining and Reclamation Plan
Gordon Creek No. 2/7/8 Mines

Jolene J. Mermis

Assistant Secretary
First Elected: 7/1/2004

Jon S. Ploetz

Secretary
First Elected: 2/15/2010

Arch Western Resources, LLC
Directors/Officers Report as of 2/19/12

Officers

Paul A. Lang

President
First Elected: 6/27/2005

Charles David Steele

Vice President - Tax
First Elected: 5/23/2003

John T. Drexler

Vice President
First Elected: 5/1/2008

James E. Florczak

Vice President
First Elected: 4/1/2002

Robert G. Jones

Vice President
First Elected: 3/1/2000

James E. Florczak

Treasurer
First Elected: 9/15/1998

Patricia A. Will

Assistant Treasurer
First Elected: 7/14/2006

Robert G. Jones

Assistant Secretary
First Elected: 3/14/2001

Jolene J. Mermis

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First Elected: 7/1/2004

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First Elected: 2/15/2010

Arch Western Bituminous Group, LLC
Directors/Officers Report as of 2/19/12

Directors

Eugene E. DiClaudio	Director First Elected: 7/29/2004
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Jon S. Ploetz	Secretary First Elected: 2/15/20 10

Mountain Coal Company, L.L.C.
Directors/Officers Report as of 2/19/12

Directors

Eugene E. DiClaudio	Director First Elected: 3/6/1 998
John W. Eaves	Director First Elected; 2/21/2005
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(Each year the annual report includes an updated list of officers and directors as well as the organizational chart for the corporation.)

2.2.7.2 Principal Shareholder of the Applicant

The name and address of any person who is a principal shareholder of the applicant

Arch Coal, Inc.
1 CityPlace Drive, Suite 300
St. Louis, Missouri 63141
(Principal and only shareholder)

(b) Leasehold interest in coal:

Mountain Coal Company

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Any purchaser of record under a real estate contract of the area to be affected by surface operations and facilities and any purchaser of record under a real estate contract of the coal to be mined:

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Gordon Creek No. 2/7/8 Mines

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Arch Coal, Inc.
1 CityPlace Drive, Suite 300
St. Louis, Missouri 63141
(Principal and only shareholder)